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Attorneys for Defendant,  
BITDEFENDER INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

BITDEFENDER INC., a Florida Corporation,  
and BITDEFENDER S.R.L., a Romanian  
Corporation,

Defendants.

Case No.: 4:17-cv-4790-HSG (MEJ)

**STIPULATION AND ORDER  
FURTHER EXTENDING FINJAN,  
INC.'S TIME TO RESPOND TO  
BITDEFENDER S.R.L.'S ANSWER  
AND COUNTERCLAIMS**

1 Pursuant to Civil Local Rules 6-1, 6-2, and 7-12, Plaintiff Finjan, Inc. (“Finjan”) and  
2 Defendants Bitdefender Inc. and Bitdefender S.R.L. (“Bitdefender SRL”) (together, “Defendants”)  
3 (collectively, the “Parties”) submit this Stipulation and [Proposed] Order further extending Finjan’s  
4 time to respond to Bitdefender S.R.L.’s Answer and Counterclaims (Dkt. No. 54) (“Answer”), in order  
5 to avoid potentially unnecessary pleadings and motion practice.

6 WHEREAS, Finjan filed its Complaint on August 16, 2017 (Dkt. No. 1);

7 WHEREAS, Bitdefender Inc. filed its Answer on November 22, 2017 (Dkt. No. 25);

8 WHEREAS, Finjan filed a motion to strike portions of Bitdefender Inc.’s Answer on  
9 December 13, 2017 (Dkt. No. 33);

10 WHEREAS, SRL filed its Answer to Finjan’s Complaint on January 26, 2018 (Dkt. No. 54);

11 WHEREAS, in order to avoid duplicate motions, the Parties stipulated (Dkt. No. 57) to extend  
12 the time for Finjan to respond to Bitdefender SRL’s Answer until two weeks after the Court had ruled  
13 on Finjan’s motion to strike portions of Bitdefender Inc.’s Answer;

14 WHEREAS, the Court granted the Parties’ stipulation on March 1, 2018 (Dkt. No. 63);

15 WHEREAS, the Court ruled on Finjan’s motion to strike portions of Bitdefender Inc.’s  
16 Answer on April 17, 2018, granting it in part and denying it in part (Dkt. No. 72);

17 WHEREAS, in light of the Court’s Order (Dkt. No. 72), Bitdefender Inc. has indicated that it  
18 intends to amend its Answer;

19 WHEREAS, in light of the Court’s Order (Dkt. No. 72), Bitdefender SRL has also agreed to  
20 amend its Answer;

21 WHEREAS, Finjan’s response to Bitdefender SRL’s Answer is currently due on May 1, 2018  
22 (see Dkt. Nos. 63 and 72);

23 WHEREAS, in order to avoid duplicate pleadings and briefing, the Parties have agreed that  
24 Bitdefender SRL will amend its Answer (Dkt. No. 54) by May 8, 2018 (the same deadline set by the  
25 Court for Bitdefender Inc. to amend its Answer (see Dkt. No. 72));

1 WHEREAS, in order to avoid duplicate pleadings and briefing, the Parties have further agreed  
2 that Finjan's time to respond to both Bitdefender Inc.'s and Bitdefender SRL's Amended Answers  
3 shall be May 22, 2018;

4 WHEREAS, the requested change does not otherwise affect the case schedule.

5 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among counsel  
6 for Finjan and counsel for Defendants that Bitdefender Inc. and Bitdefender SRL will both file  
7 Amended Answers no later than May 8, 2018. THE PARTIES FURTHER STIPULATE AND  
8 AGREE that the deadline for Finjan to respond to Bitdefender Inc.'s and Bitdefender SRL's Amended  
9 Answers shall be May 22, 2018.

10 ///

11 ///

12 ///

Respectfully submitted,

DATED: April 27, 2018

By: /s/ Austin Manes

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*Attorneys for Plaintiff*  
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Respectfully submitted,

DATED: April 27, 2018

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*Attorneys for Defendants,*  
BITDEFENDER INC. and  
BITDEFENDER S.R.L.

1 **ATTESTATION**

2 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
3 document has been obtained from any other signatory to this document.


4  
5 /s/ Austin Manes  
Austin Manes

6  
7 **ORDER**

8 Pursuant to the Parties' Stipulation, it is hereby ordered that the deadline for Bitdefender Inc.  
9 and Bitdefender SRL to file Amended Answers shall be May 8, 2018. It is further ordered that the  
0 deadline for Finjan to respond to Bitdefender Inc.'s and Bitdefender SRL's Answers or Amended  
1 Answers, if any, shall be May 22, 2018.

2  
3 IT IS SO ORDERED.

4  
5 Dated: April 30, 2018

6   
HON. HAYWOOD S. GILLIAM JR.  
United States District Court Judge